



Rule Up For Discussion

Proposed Amendment to

WAC 230-30-072

Inventory control for punch boards and pull-tabs -- Retention requirements -- Audit adjustments.

ITEM 14 (a) on the February 13, 2004, Commission Meeting Agenda.

Statutory Authority 9.46.070

Who proposed the rule change?

Valerie Storkson, Stork's Restaurant and Lounge.

Why is this rule change needed?

Valerie Storkson, Stork's Restaurant and Lounge, submitted a Petition for Rule Change which was filed at the November 2003, Commission meeting, with the anticipation that staff would provide a recommendation at the next meeting.

Ms. Storkson is requesting an amendment to WAC 230-30-072, which sets pull-tab inventory controls. Subsection (2) requires that an identification and inspection services (I.D.) stamp be affixed to the distributor's invoice prior to a pull-tab game being put out for play. The petitioner requests a rule amendment to allow pull-tab operators to place I.D. stamps on the invoice after the game is removed from play, rather than when it is first put out for play. The petitioner indicates this would better facilitate her inventory control method.

Staff analyzed the petition and offers observations on the following memo for the Commission to consideration as the petition is discussed.

In summary, current inventory requirements are effective and continue to be necessary in our regulatory program. The attached memo suggests ways for the petitioner to deal with her inventory concerns without going through the process of a formal rule change. Staff recommends that the Commission vote to not adopt the proposed rule change.

Attachments:

Memo dated December 30, 2003, from the Rules Team to Director Day.

Punch board/Pull-tab Inventory Accountability Records.

Petition for Rule Change submitted by Valerie Storkson.

Amended text of WAC 230-30-072.

Letter dated January 29, 2004, to Ms. Storkson notifying her of staff's recommendation and that her Petition will be discussed further at the February 13, 2004, Commission meeting.

Statements against the proposed rule change.

None at this time.

Which licensees will be directly impacted?

Pull-tab licensees.

What are the potential impacts to the agency?

Increase agent time during records inspections and reduce ability of pull-tab operators of identifying if pull-tab games match the distributors invoice.

Staff recommendation.

Vote to not adopt the proposed rule change.